

AB:JOE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

PRE-ARRAIGNMENT
COMPLAINT

- against -

(T. 21, U.S.C., §§ 952(a), 960(a)(1) and
960(b)(2)(B)(ii))

TYANDRE TAVARES,

Defendant.

No. 22-MJ-1248

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EASTERN DISTRICT OF NEW YORK, SS:

DERRICK TARDIVE, being duly sworn, deposes and states that he is a Special Agent with the U.S. Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

On or about November 22, 2022, within the Eastern District of New York and elsewhere, the defendant TYANDRE TAVARES did knowingly and intentionally import controlled substances into the United States from a place outside thereof, which offense involved substances containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(2)(B)(ii))

The source of your deponent’s information and the grounds for his belief are as follows:¹

¹ Because the purpose of this complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On or about November 22, 2022, the defendant TYANDRE TAVARES arrived at John F. Kennedy International Airport in Queens, New York, (“JFK Airport”) aboard Copa Airlines Flight 809 from Panama City, Panama.

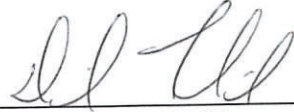
2. United States Customs and Border Protection (“CBP”) officers met the defendant TYANDRE TAVARES upon his arrival at JFK. CBP officers interviewed TAVARES, who stated that he had swallowed approximately 50 to 100 pellets of cocaine. A CBP officer escorted TAVARES to a medical facility within JFK Airport.

3. The defendant TYANDRE TAVARES consented to an x-ray by medical staff, which x-ray read positive for foreign bodies. Medical staff then examined TAVARES, who has, as of the date and time of the filing of this complaint, passed approximately 60 pellets.

4. CBP probed one of the pellets, which contained a white powdery substance that field-tested positive for cocaine. In total, the pellets TAVERAS has passed weigh approximately 804.5 grams.

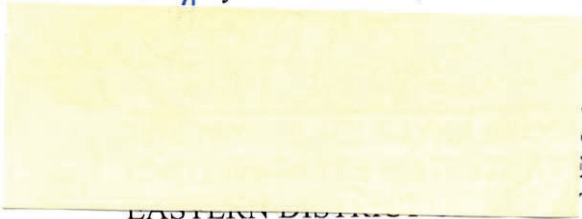
5. The defendant TYANDRE TAVARES will be detained at the JFK Airport medical facility until such time as he has passed all the pellets contained within his intestinal track.

WHEREFORE, your deponent respectfully requests that the defendant
TYANDRE be dealt with according to law.



DERRICK TARDIVE
Special Agent
Homeland Security Investigations

Sworn to before me this
23rd day of November, 2022



JUDGE
EASTERN DISTRICT OF NEW YORK